

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF OKLAHOMA**

|                              |   |                 |
|------------------------------|---|-----------------|
| UNITED STATES OF AMERICA,    | ) |                 |
|                              | ) |                 |
| Plaintiff,                   | ) |                 |
|                              | ) |                 |
| -vs-                         | ) | No. 20-CR-4-JFH |
|                              | ) |                 |
| EARLY WILLARD WOODMORE, III, | ) |                 |
|                              | ) |                 |
| Defendants.                  | ) |                 |

**OPPOSED MOTION TO DISMISS AND EXCLUDE**

COMES NOW, the Defendant, Early Willard Woodmore III, by and through his attorney of record in this matter, Craig M. Hoehns, and moves this Court to dismiss matter and/or provide other such appropriate relief and in support thereof, Defendants state:

1. Defendant was charged by indictment on January 14, 2020. (Doc. 2).
2. The Defendant is entitled to a fair and impartial jury. U.S. Const. amend. VI.
3. The Defendant is entitled to defense of counsel since accusations were made in this matter.
4. That since charges were filed, the government seized defendant's property/legal paperwork without search warrant and/or legal cause during the pendency of a criminal prosecution.
5. Specifically, the government has seized legal paperwork in possession of the defendant possessed for purposes of defense of the charges against the defendant.

6. That such seizure of documentation was in violation of the U.S. Constitution and the Oklahoma Constitution.

WHEREFORE, Defendants requests that the Court dismiss charges against the Defendant and/or grant relief as is appropriate.

Respectfully submitted,

s/ Craig M. Hoehns  
Craig M. Hoehns  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on February 7, 2022, I electronically transmitted the document to the Clerk of Court using the Electronic Case Filing System for filing. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System.

s/ Craig M. Hoehns